

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:17-CR-181-O

MICHELLE NICOLE DUNEGAN (01)

F A C T U A L   R E S U M E

SUPERSEDING      Count One: Conspiracy to Possess a Controlled Substance with  
INFORMATION:      intent to Distribute (methamphetamine)  
                                 (in violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and  
                                 (b)(1)(C))

PENALTY:      \$1,000,000 fine - not more than 20 years' imprisonment, or both such fine  
                                 and imprisonment, plus a term of supervised release of not less than 3  
                                 years.

MAXIMUM PENALTY:

\$1,000,000 fine, and not more than twenty (20) years' imprisonment, plus a term of supervised release of not less than 3 years. If the defendant violates any condition of supervised release, the Court may revoke such term of supervised release and require the defendant to serve an additional period of confinement. Further the Court must impose a Mandatory Special Assessment of \$100.00.

ELEMENTS OF THE OFFENSE:

The essential elements which must be proved beyond a reasonable doubt in order to establish the offenses charged in Count One of the Superseding Information are as follows:

First:              That two or more persons, directly or indirectly, reached an agreement to distribute or possess with intent to distribute a controlled substance, as charged in the information;

Second:            That the defendant knew of the unlawful purpose of the agreement;

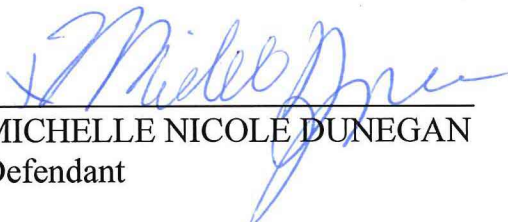
Third: That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose; and


Fourth: That the overall scope of the conspiracy involved a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

STIPULATED FACTS:

In 2015 and 2016, Michelle Nicole Dunegan and Ronald Robert Oliver received methamphetamine from Jose Pablo Morales, often on consignment. In turn, Michelle Nicole Dunegan and Ronald Robert Oliver distributed methamphetamine to various customers in the Northern District of Texas, returning to Jose Pablo Morales for additional methamphetamine. In this manner, Michelle Nicole Dunegan, Ronald Robert Oliver, and Jose Pablo Morales conspired with each other and others to possess methamphetamine with intent to distribute.

SIGNED this 6 day of October, 2017.

  
MICHELLE NICOLE DUNEGAN  
Defendant

  
RANDY W. BOWERS  
Counsel for Defendant